

2019L001530

## DAVID KRUPA,

**V.**

No.

## JURY TRIAL DEMANDED

MARTY QUINN, BETH QUINN,  
MICHAEL J. MADIGAN, CITIZENS FOR  
MARTY QUINN, and 13TH WARD  
DEMOCRATIC ORGANIZATION,

### Respondents in Discovery.

NOW COMES Plaintiff, DAVID KRUPA, and for his Complaint against Defendants

CHICAGO TEACHERS UNION and JEANINE MUIR (a/k/a “Jan Muir”), with MARTY QUINN, BETH QUINN, MICHAEL J. MADIGAN, CITIZENS FOR MARTY QUINN, and 13TH WARD DEMOCRATIC ORGANIZATION as Respondents in Discovery pursuant to 735 ILCS 5/2-204(20-18), states as follows:

This action presents just the latest instance of unlawful Machine conduct practiced against a reform minded 19 year old Aldermanic candidate by powerful and clearly worried supporters of his incumbent Machine opponent. Apparently filing thousands of false affidavits with the Board of Election Commissioners of the City of Chicago to remove David from the ballot was not enough (see *Krupa v. Quinn*, Case No. 19 cv 543 in the United States District Court for the Northern District of Illinois), David Krupa must now suffer his reputation being

FILED DATE: 2/11/2019 5:14 PM 2019L001530

smeared by false criminal allegations arising from a powerful Machine union and a staff member at a school where his opponent's wife is an employee. The statements of that union and staff member that David somehow, at some unstated time, engaged in "cyberstalking" and "cyberbullying" by publishing offensive material on a school website, are false. David Krupa not only did not engage in any such conduct, has never attended or even entered the school in question. He therefore seeks judgment for defamation.

### PARTIES

1. Plaintiff DAVID KRUPA (hereinafter "DAVID") is a resident of Cook County, Illinois.

2. Defendant CHICAGO TEACHERS UNION (hereinafter "CTU"), is a labor organization as defined by the Illinois Education Labor Relations Act, 115 ILCS 5/1 *et seq.* The CTU is recognized by the Illinois Educational Labor Relations Board as the "Exclusive Representative" for teachers employed by Chicago Public Schools. The headquarters of the CTU is located at 1901 East Carroll Avenue, Chicago, Illinois.

3. Defendant JEANINE MUIR a/k/a Jan Muir is a resident of Cook County Illinois. While her actual name is "Jeanine Muir", MUIR commonly goes by the name "Jan Muir."

4. Respondent in Discovery MARTY QUINN is joined pursuant to 735 ILCS 5/2-204 (2018). MARTY QUINN is a resident of Chicago, Illinois. At all times relevant QUINN was an Alderman of the City of Chicago representing the 13<sup>th</sup> Ward of the City of Chicago and Chairman of Respondent in Discovery CITIZENS FOR MARTY QUINN.

5. Respondent in Discovery BETH QUINN is joined pursuant to 735 ILCS 5/2-204 (2018). BETH QUINN is the wife of MARTY QUINN and a resident of Chicago, Illinois.

6. Respondent in Discovery MICHAEL J. MADIGAN (hereinafter "MADIGAN") is joined pursuant to 735 ILCS 5/2-204 (2018). MADIGAN is a resident of Chicago, Illinois. At all times relevant hereto MADIGAN was Speaker of the Illinois House of Representatives, Representative in the Illinois House of Representatives representing the 22nd Illinois House District of the State of Illinois, Chairman of the Illinois Democratic Party, Democratic Ward Committeeman for the 13<sup>th</sup> Ward in the City of Chicago and Chairman of Respondent in Discovery 13TH WARD DEMOCRATIC ORGANIZATION.

7. Respondent in Discovery CITIZENS FOR MARTY QUINN (hereinafter "CITIZENS FOR QUINN") is joined pursuant to 735 ILCS 5/2-204 (2018). CITIZENS FOR QUINN was at all times relevant hereto an Illinois political committee based within Cook County, State of Illinois.

8. Respondent in Discovery 13TH WARD DEMOCRATIC ORGANIZATION (hereinafter "13TH WARD") is joined pursuant to 735 ILCS 5/2-204 (2018). 13<sup>TH</sup> WARD was at all times relevant hereto an Illinois political committee with its principal place of business based in Cook County, State of Illinois.

#### **JURISDICTION AND VENUE**

9. This Honorable Court has subject matter jurisdiction over this matter pursuant to Ill. Const. art. VI, § IX.

10. This Honorable Court has personal jurisdiction over the Defendants pursuant to several subsections of 735 ILCS 5/2-209, including but not limited to because the Defendants reside or are headquartered in Cook County, Illinois.

11. This Honorable Court has personal jurisdiction over the Respondents in Discovery pursuant to several subsections of 735 ILCS 5/2-209, including but not limited to because the Defendants reside or are headquartered in Cook County, Illinois.

12. Venue is proper in this Honorable Court pursuant to 735 ILCS 5/2-101(2) because the Defendants reside or are headquartered in Cook County, Illinois and because the events complained of took place in Cook County, Illinois.

### **STATEMENT OF FACTS**

13. DAVID is a candidate for the office of Alderman for the 13<sup>th</sup> Ward of Chicago in the municipal election occurring in Chicago Illinois on February 26, 2019 (the "Election").

14. DAVID's sole opponent in the Election is MARTY QUINN.

15. On information and belief QUINN holds his aldermanic position exclusively through the political support of MADIGAN, supports all political positions and operations of MADIGAN as a loyal surrogate, and receives and follows the directives of MADIGAN concerning political matters, including but not limited to (1) QUINN's actions within the government of the City of Chicago, (2) QUINN's actions as Alderman within the 13<sup>th</sup> Ward of the City of Chicago, and (3) QUINN's political activities and endorsements. QUINN also routinely works on campaigns for MADIGAN and acts on behalf of MADIGAN as a political strategist and political operative.

16. The purpose of CITIZENS FOR QUINN is to elect MARTY QUINN to office. CITIZENS FOR QUINN is staffed by and/or employs campaign workers and supporters of QUINN and MADIGAN. At all times relevant hereto, CITIZENS FOR QUINN acted by and through its employees and/or agents.

17. Defendant 13TH WARD conducts political activities in the 13<sup>th</sup> Ward of the City of Chicago under the direction of MADIGAN and MARTY QUINN. At all times relevant hereto, CITIZENS FOR QUINN acted by and through its employees and/or agents.

18. MUIR is, on Plaintiff's information and belief, based upon review of the website of Nathan Hale Elementary School of Chicago, Illinois, a teacher at said school. Nathan Hale Elementary School is located in the 13<sup>th</sup> Ward of the City of Chicago.

19. On Plaintiff's information and belief, based upon review of the website of Nathan Hale Elementary School of Chicago, BETH QUINN is also employed at said school and is a colleague of MUIR.

20. On or before February 1, 2018, Defendants, and possibly others unknown to Plaintiff including but not limited to one or more Respondents in Discovery, created a letter on the letterhead of the CTU and signed by MUIR (the "False Letter"), a copy of which is attached hereto as Exhibit "A."

21. The False Letter opens with the salutation "Dear 13<sup>th</sup> Ward Resident."

22. The False Letter contains the statement that MUIR is a "middle school teacher" and a "member of the Chicago Teachers Union."

23. The False Letter contains the statement that DAVID engaged in "cyberstalking" and "cyberbullying" by "breaching a school computer and posting disturbing language and images that shocked me and my students" (hereinafter the "Statement").

24. The False Letter contains the statement that that "this letter is part of my attempt to hold him accountable for his actions" referring to DAVID.

25. The False Letter contains the statement that DAVID's purported conduct "demonstrates a complete disregard for women and a pattern of judgment that disqualifies him for public office."

26. In the False Letter, MUIR urged voters in the 13<sup>th</sup> Ward "not to vote for Mr. Krupa in the upcoming municipal election."

27. Defendants and possibly others unknown to Plaintiff including but not limited to one or more Respondents in Discovery, caused copies of the False Letter to be sent to an extensive, but as yet unknown number of people by use of the mails and internet, with the number of recipients believed to be in the tens of thousands.

28. The actions taken by MUIR were taken as actions of both MUIR individually and the CTU.

**COUNT I**  
**Defamation Per Se**

29. DAVID re-alleges and incorporates by reference paragraphs 1 through 28 as though fully set forth herein.

30. The Statement is completely false. In fact, DAVID has never attended or even entered Nathan Hale Elementary School.

31. Defendants knew that the Statement was false at the time the False Letter was created and published, or acted with reckless disregard concerning the veracity of the Statement.

32. Defendants published a false written statement that was intended to impeach Plaintiff's honesty, integrity, virtue, or reputation.

33. Defendants' defamatory statement was published maliciously and with intent to destroy the Plaintiff's reputation in general and Plaintiff's chances for election as Alderman for the 13<sup>th</sup> Ward in the City of Chicago in the Election.

34. The False Letter contains statements that MUIR was a “victim of cyberstalking and cyberbullying by Aldermanic Candidate David Krupa” and otherwise described conduct that constitutes one or more criminal offenses under the laws of Illinois.

35. As a proximate result of the foregoing defamatory statements by Defendants, Plaintiff suffered injuries, including injuries to his reputation and other damages.

36. The foregoing defamatory statements were made in bad faith by Defendants with the knowledge of their falsity or in reckless disregard concerning the veracity of the Statement and with intent to harm, so as to justify an award of punitive damages.

37. Defendants have engaged in defamation *per se* against Plaintiff by falsely imputing his commission of a criminal offense.

WHEREFORE, Plaintiff, DAVID KRUPA, respectfully requests that this Honorable Court enter judgment in his favor and against Defendants CHICAGO TEACHERS UNION and JEANINE MUIR (a/k/a “Jan Muir”) for compensatory damages in an amount in excess of ONE MILLION (\$1,000,000) DOLLARS, and for exemplary damages in excess of THREE MILLION (\$3,000,000) DOLLARS to punish Defendants, and deter Defendants and others from similar conduct in the future.

## COUNT II

### Defamation per Quod

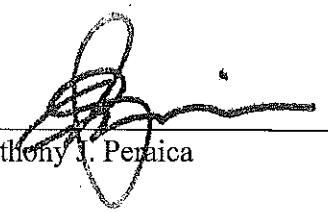
38. DAVID re-alleges and incorporates by reference paragraphs 1 through 36 as though fully set forth herein.

39. Defendants have engaged in defamation *per quod* against Plaintiff.

WHEREFORE, Plaintiff, DAVID KRUPA, respectfully requests that this Honorable Court enter judgment in his favor and against Defendants CHICAGO TEACHERS UNION and JEANINE MUIR (a/k/a “Jan Muir”) for compensatory damages in an amount in excess of ONE

MILLION (\$1,000,000) DOLLARS, and for exemplary damages in excess of THREE MILLION (\$3,000,000) DOLLARS to punish Defendants, and defer Defendants and others from similar conduct in the future.

Respectfully submitted,  
DAVID KRUPA

By:   
Anthony J. Peraica

Anthony J. Peraica & Associates, Ltd.  
5130 South Archer Ave.  
Chicago, IL 60632  
(773) 735-1700  
Attorney No. 54011



CERTIFICATION

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

*David Krupa*

\_\_\_\_\_  
DAVID KRUPA

February 1, 2019

FILED  
2/11/2019 5:14 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL

2019L001530

Attorneys  
American Federation  
Teachers, Illinois F  
Teachers, Ameri  
Union of Lab  
Union of Indu  
Union of Indu  
Congress of Indu  
Organizations, an  
Federation of Lat  
Industrial Union I

Dear 13th Ward Resident:

My name is Jan Muir. I am a middle school teacher, a member of the Chicago Teachers Union, and a victim of cyberstalking and cyberbullying by Aldermanic candidate David Krupa. Despite my desire to put this incident behind me, I'm writing today to share my story to inform others of his behavior.

Mr. Krupa harassed and bullied me through breaching a school computer system and posting disturbing language and images that shocked me and my students. In order to protect my students' privacy, I will not share any additional information about the incident.

My sense of personal safety and security were violated, and this letter is part of my effort to hold him accountable for his behavior.

Through his actions, Mr. Krupa demonstrates complete disregard for women and a pattern of judgment that disqualifies him from holding public office. I respectfully request that you do not vote for Mr. Krupa in the upcoming municipal election.

I also hope that you will join me in speaking out about the dangers of cyberstalking and speak with your children about how to spot and prevent cyberbullying. More information is available at <https://www.stopbullying.gov/cyberbullying/prevention/index.html>

Thank you for reading my story and sharing it with your family and neighbors.

Best regards,

*Jan Muir*  
Jan Muir

